

JUDGE PHILIP MARTINEZ

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CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CYNTHIA REBECCA FLORES,

Defendant.

§ CRIMINAL NO: EP-14-CR-

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SEALED  
INDICTMENT

CT 1: 26 U.S.C. § 7201 – Tax Evasion.

CT 2: 26 U.S.C. § 7201 – Tax Evasion.

EP 14 CR 2271

THE GRAND JURY CHARGES THAT:

COUNT ONE

(26 U.S.C. § 7201)

On or about April 15, 2010, in the Western District of Texas and elsewhere, the Defendant,

CYNTHIA REBECCA FLORES,

during the calendar year 2009, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2009, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service. In that false income tax return, the defendant, **CYNTHIA REBECCA FLORES**, stated her taxable income for the calendar year was the sum of \$48,712.00, and that the amount of tax due and owing thereon was the sum of \$7,034.00. In fact, as the defendant, **CYNTHIA REBECCA FLORES**, then and there knew, her taxable income for the calendar year was the sum of \$138,593.21, upon which taxable income was owing to the United States of America an income tax of \$24,101.10, in violation of Title 26, United States Code, Section 7201.

**COUNT TWO**  
(26 U.S.C. § 7201)

On or about April 18, 2011, in the Western District of Texas and elsewhere, the Defendant,

**CYNTHIA REBECCA FLORES,**

during the calendar year 2010, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2010, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service. In that false income tax return, the defendant, **CYNTHIA REBECCA FLORES**, stated her taxable income for the calendar year was the sum of \$48,747.00, and that the amount of tax due and owing thereon was the sum of \$7,029.00. In fact, as the defendant, **CYNTHIA REBECCA FLORES**, then and there knew, her taxable income for the calendar year was the sum of \$152,571.37, upon which taxable income was owing to the United States of America an income tax of \$27,519.98, in violation of Title 26, United States Code, Section 7201.

A TRUE ~~ORIGINAL~~ **ORIGINAL SIGNATURE**  
**REDACTED PURSUANT TO**  
**E-GOVERNMENT ACT OF 2002**

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FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

BY:

  
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Assistant U.S. Attorney